

## Law Offices of Irina Roller, PLLC

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January 25, 2024

VIA ECF

Hon. Valerie E. Caproni  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 1/25/2024

Re: *J.A., et al. v. New York City Department of Education*  
23-cv-8547 (VEC)(VF)

Dear Judge Caproni,

This firm represents the Plaintiffs in the above action. Plaintiffs brought this action as undisputed prevailing parties seeking attorneys' fees, costs and expenses under the fee shifting provision of the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §1400, *et seq.*

Plaintiffs submit this letter requesting an adjournment of the current briefing scheduling set by the Court's November 29, 2023 Endorsed Memo (Dkt. No. 14). The parties have been in active settlement negotiations.

At this time we are requesting additional time to for the submission of Plaintiffs' Motion for Summary Judgment. Plaintiffs' propose the following schedule:

- Motion for summary judgment due by April 9, 2024
- Defendant's opposition due by May 9, 2024
- Plaintiffs' reply due by May 23, 2024

Defendants consent to Plaintiffs' request and the above schedule.

Thank you for your time and consideration.

Respectfully submitted,

s/  
Irina Roller  
*Attorney for the Plaintiffs*

Cc: Marina Moraru, Esq. (*via ECF*)  
Martin Bowe, Esq. (*via ECF*)

Application GRANTED. Plaintiff's Motion for Summary Judgment must be filed no later than April 9, 2024; Defendant's opposition must be filed no later than May 9, 2024, with Plaintiff's reply due no later than May 23, 2024.

Should the parties find it helpful to facilitate a settlement, upon a joint request at any time, the Court will enter a referral to either the Court-annexed mediation program or to the Hon. Valerie Figueredo, U.S. Magistrate Judge for a settlement conference.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

1/25/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE